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March 14, 2022

VIA E-FILING

Honorable Judge Douglas E. Arpert, U.S.M.J
United States District Court
District of New Jersey
Trenton, New Jersey

**Re: Souleiman v Bass, et al
NJ District Court Case No: 3:21-cv-09555-MAS-DEA
(Our File No: 33026-2)**

Dear Judge Arpert:

We represent plaintiffs, Mourad Souleiman, Ketty Souleiman, Elie Souleiman and Paula Souleiman, who were the victims of a scheme through which \$320,000 intended for a property purchase was lost after their attorney, Peter Bass, Esq.'s, AOL email account was hacked and they were directed by an email to wire their funds to a bank account owned and controlled by defendants Brett Williams and Blu Sky Holdings, LLC.

I am communicating with you pursuant to Local Rule 37.1 seeking to resolve a discovery issue with the defendants.

On January 3, 2022, I served interrogatories and a document demand on defendants Brett Williams and Blu Sky Holdings, LLC (collectively "Blu Sky"). I have communicated with those defendants' counsel several times regarding counsel's intention to remain in the case and to provide answers to discovery. This includes a March 2, 2022 letter seeking to obtain discovery responses.

In addition, Blu Sky still has not provided its Rule 26 Initial Disclosures.

Based upon Blu Sky's failure to participate in discovery coupled with its apparent involvement in this scam, it is respectfully requested that this Court schedule a conference in short order to determine if Blu Sky intends to participate in discovery or even intends to defend this case.



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Similarly, on January 31, 2022, I served interrogatories and document demands on defendant, Peter Bass, Esq., and on March 2, 2022 corresponded with his counsel seeking to determine when I might receive responses. I have not received a response to that correspondence.

We would welcome a telephone conference with the Court to discuss these efforts and as a predicate to filing the necessary motion to seek relief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "EAI".

EAI/lmd

Eric A. Inglis